

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

In re FIRSTENERGY CORP. SECURITIES LITIGATION)	No. 2:20-cv-03785-ALM-KAJ
)	
)	<u>CLASS ACTION</u>
)	
This Document Relates To:)	Judge Algenon L. Marbley
)	Magistrate Judge Kimberly A. Jolson
ALL ACTIONS.)	
)	

DECLARATION OF RACHEL A. COCALIS IN SUPPORT OF PLAINTIFFS' MOTION TO COMPEL DISCOVERY AND COMPLIANCE WITH THE COURT'S APRIL 5, 2023 ORDER FROM NON-PARTIES SAMUEL C. RANDAZZO AND SUSTAINABILITY FUNDING ALLIANCE OF OHIO, INC.

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Lead Counsel for Lead Plaintiff Los Angeles County Employees Retirement Association and Plaintiffs Amalgamated Bank, City of Irving Supplemental Benefit Plan, and Wisconsin Laborers' Pension Fund

I, RACHEL A. COCALIS, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of California and have been admitted *pro hac vice* in the above-entitled action. I am associated with the law firm of Robbins Geller Rudman & Dowd LLP, Lead Counsel for Lead Plaintiff Los Angeles County Employees Retirement Association and Plaintiffs Amalgamated Bank, as Trustee for the LongView LargeCap 500 Index Fund, LongView Quantitative LargeCap Fund, LongView Broad Market 3000 Index Fund, LongView LargeCap 500 Index Fund VEBA, LV LargeCap 1000 Value Index Fund, LongView Quantitative MidCap Fund, LongView Quant LargeCap Equity VEBA Fund and LongView Core Plus Fixed Income Fund, City of Irving Supplemental Benefit Plan, and Wisconsin Laborers' Pension Fund (collectively, the "Class Plaintiffs") in the above-entitled action. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. I submit this declaration in support of Plaintiffs' Motion to Compel Discovery and Compliance with the Court's April 5, 2023 Order From Non-Parties Samuel C. Randazzo and Sustainability Funding Alliance of Ohio, Inc.

3. Attached hereto are true and correct copies of the following exhibits:

EXHIBIT NO.	DESCRIPTION	FILED ¹
Exhibit 1:	Letter from Rachel A. Cocalis to Roger P. Sugarman, dated July 6, 2023;	Public
Exhibit 2:	Email string between Samuel C. Randazzo and Justin T. Biltz, dated February 14, 2019 (Bates No. FE_CIV_SEC_0017219);	<i>In Camera</i>

¹ Exhibits 2-5 and 7 are being provided *in camera* pursuant to §8 of the Amended Stipulated Protective Order (ECF 411) as defendant FirstEnergy Corp. has designated these documents confidential under the Amended Stipulated Protective Order.

EXHIBIT NO.	DESCRIPTION	FILED¹
Exhibit 3:	Email string between Michael J. Dowling and Samuel C. Randazzo, dated January 27, 2019 (Bates No. FE_CIV_SEC_0197266-68);	<i>In Camera</i>
Exhibit 4:	Email string between Michael J. Dowling and Samuel C. Randazzo, dated January 30, 2019 (Bates No. FE_CIV_SEC_0197331-34);	<i>In Camera</i>
Exhibit 5:	Email string between Michael J. Dowling and Samuel C. Randazzo, dated January 30, 2019 (Bates No. FE_CIV_SEC_0197339-42);	<i>In Camera</i>
Exhibit 6:	Email string between Mike Dawson, Matt Evans, Michael J. Dowling, and Samuel C. Randazzo, dated February 1, 2019 (Bates No. FE_CIV_SEC_0197436-44);	Public
Exhibit 7:	Email string between Samuel C. Randazzo and Michael J. Dowling et al., dated January 30, 2019 (Bates No. FE_CIV_SEC_0197347-51); and	<i>In Camera</i>
Exhibit 8:	Email string between Roger P. Sugarman and Rachel A. Cocalis, dated July 12, 2023.	Public

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 14, 2023, at San Diego, California.



RACHEL A. COCALIS